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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

2:20-MC-00072-TLN-EFB

12 Plaintiff,

13 v.

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

14 2019 MERCEDES-BENZ E63 AMG-S, VIN:  
WDDZF8KB8KA608709, CALIFORNIA  
15 LICENSE NUMBER 1UEV351,

16 APPROXIMATELY 0.041836 BITCOIN,

17 APPROXIMATELY 18.12902639 BITCOIN,

18 APPROXIMATELY 26.56443065 BITCOIN,

19 APPROXIMATELY \$1,712,611.00 IN U.S.  
20 CURRENCY,

21 ONE (1) BITCOIN CASASCIUS COIN,

22 ONE (1) CANADIAN GOLD COIN,

23 ONE (1) AMERICAN EAGLE GOLD COIN,

24 ONE (1) CUMMINS ALLISON MONEY  
COUNTER,

25 APPROXIMATELY \$3,050.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 1301  
26 MACARTHUR BOULEVARD, OAKLAND,  
CALIFORNIA,

27 APPROXIMATELY \$51,590.00 SEIZED  
28 FROM LAMASSU BTM LOCATED AT 395

1 BIRD AVENUE, SAN JOSE, CALIFORNIA,

2 APPROXIMATELY \$2,475.00 SEIZED  
3 FROM LAMASSU BTM LOCATED AT 1310  
4 BROADWAY, OAKLAND, CALIFORNIA,

5 APPROXIMATELY \$1,945.00 SEIZED  
6 FROM LAMASSU BTM LOCATED AT 1305  
7 N. BASCOM, SAN JOSE, CALIFORNIA,

8 APPROXIMATELY \$20,090.00 SEIZED  
9 FROM LAMASSU BTM LOCATED AT 996  
10 PINE STREET, SAN FRANCISCO,  
11 CALIFORNIA,

12 APPROXIMATELY \$3,115.00 SEIZED  
13 FROM LAMASSU BTM LOCATED AT  
14 25757 SOTO ROAD, HAYWARD,  
15 CALIFORNIA,

16 APPROXIMATELY \$24,890.00 SEIZED  
17 FROM LAMASSU BTM LOCATED AT 1894  
18 UNIVERSITY AVENUE, BERKELEY,  
19 CALIFORNIA,

20 APPROXIMATELY \$3,800.00 SEIZED  
21 FROM LAMASSU BTM LOCATED AT 7500  
22 COMMERCIAL BOULEVARD, COTATI,  
23 CALIFORNIA,

24 APPROXIMATELY \$3,325.00 SEIZED  
25 FROM LAMASSU BTM LOCATED AT  
26 14701 SAN PABLO AVENUE, SAN PABLO,  
27 CALIFORNIA,

28 APPROXIMATELY \$3,785.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 3210  
BUSKIRK AVENUE, PLEASANT HILL,  
CALIFORNIA,

APPROXIMATELY \$2,835.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 605  
CONTRA COSTA BOULEVARD,  
CONCORD, CALIFORNIA,

APPROXIMATELY \$6,480.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 860  
ARDEN WAY, SACRAMENTO,  
CALIFORNIA,

APPROXIMATELY \$22,660.00 SEIZED  
FROM LAMASSU BTM, LOCATED AT  
1151 GALLERIA BOULEVARD,  
ROSEVILLE, CALIFORNIA,

1 APPROXIMATELY \$14,805.00 SEIZED  
2 FROM LAMASSU BTM LOCATED AT 5127  
3 FRANKLIN BOULEVARD, SUITE 1,  
4 SACRAMENTO, CALIFORNIA,

5 APPROXIMATELY \$10,340.00 SEIZED  
6 FROM LAMASSU BTM LOCATED AT 620  
7 W. CHARTER WAY, STOCKTON,  
8 CALIFORNIA,

9 APPROXIMATELY \$6,010.00 SEIZED  
10 FROM LAMASSU BTM LOCATED AT 4709  
11 FLORIN ROAD, SACRAMENTO,  
12 CALIFORNIA,

13 APPROXIMATELY \$6,125.00 SEIZED  
14 FROM LAMASSU BTM LOCATED AT 2221  
15 DEL PASO ROAD, SACRAMENTO,  
16 CALIFORNIA,

17 APPROXIMATELY \$130.00 SEIZED FROM  
18 LAMASSU BTM LOCATED AT 1744 N.  
19 TEXAS STREET, FAIRFIELD,  
20 CALIFORNIA, AND

21 APPROXIMATELY \$5,915.00 SEIZED  
22 FROM LAMASSU BTM LOCATED AT 400  
23 LINCOLN ROAD EAST, VALLEJO,  
24 CALIFORNIA,

25 Defendants.

26 It is hereby stipulated by and between the United States of America and potential claimants Rehan  
27 Alvi and Rubina Alvi ("claimants"), by and through their respective counsel as follows:

28 1. On or about November 26, 2019, the Homeland Security Investigations and Federal Bureau  
of Investigation seized the above-referenced defendant assets pursuant to Federal seizure warrants  
(hereafter collectively "defendant assets").

2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to  
send notice to potential claimants, file a complaint for forfeiture against the defendant assets, or obtain an  
indictment alleging that the defendant assets are subject to forfeiture within ninety days of seizure, unless  
the court extends the deadline for good cause shown or by agreement of the parties. That deadline was  
April 17, 2020.

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1           3.       By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 16,  
2 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
3 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

4           4.       By Stipulation and Order filed June 25, 2020, the parties stipulated to extend to October  
5 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

7           5.       By Stipulation and Order filed October 14, 2020, the parties stipulated to extend to  
8 December 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
9 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
10 to forfeiture.

11           6.       By Stipulation and Order filed December 11, 2020, the parties stipulated to extend to  
12 March 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
13 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
14 to forfeiture.

15           7.       By Stipulation and Order filed March 16, 2021, the parties stipulated to extend to May 14,  
16 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
17 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

18           8.       By Stipulation and Order filed May 17, 2021, the parties stipulated to extend to August 12,  
19 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
20 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

21           9.       By Stipulation and Order filed August 10, 2021, the parties stipulated to extend to  
22 November 9, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
23 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
24 to forfeiture.

25           10.      By Stipulation and Order filed November 8, 2021, the parties stipulated to extend to  
26 February 7, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
27 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
28 to forfeiture.

11. By Stipulation and Order filed February 4, 2022, the parties stipulated to extend to May 9, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

12. By Stipulation and Order filed May 5, 2022, the parties stipulated to extend to August 5, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

13. By Stipulation and Order filed August 2, 2022, the parties stipulated to extend to October 10, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

14. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to January 9, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

15. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture shall be extended to January 9, 2023.

Dated: 10/7/22

PHILLIP A. TALBERT  
United States Attorney

By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

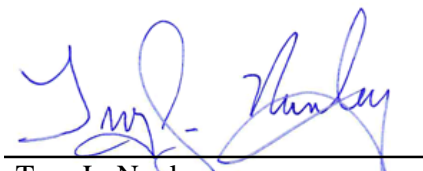
Dated: 10/7/22

/s/ Thomas A. Johnson  
THOMAS A. JOHNSON  
Attorney for Potential Claimants  
Rehan and Rubina Alvi

(Signatures authorized by email)

**IT IS SO ORDERED.**

Dated: October 7, 2022

  
Troy L. Nunley  
United States District Judge